State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

(217) 785-6020
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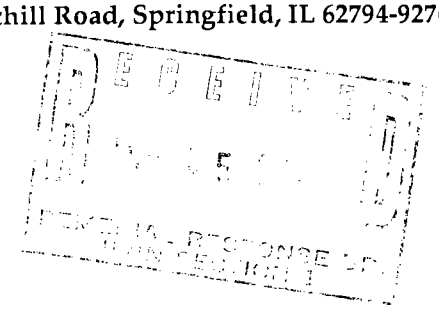

February 28, 1996

Mr. Timothy J. Fischer
Remedial Project Manager
United States Environmental Protection Agency Region 5
77 West Jackson Blvd
Chicago, Illinois 60604-3590

Re: 1630105014 - St. Clair County
Scott Air Force Base (SAFB)
Installation Restoration Program (IRP) Site 7 Sludge Lagoon Closure Study
Superfund/Technical Reports

Dear Mr. Fischer:

The Illinois Environmental Protection Agency (IEPA) has produced comments regarding the closure of the former sludge lagoon at SAFB. I had forgotten to cc you, therefore please find the attached letter with those comments.

If you would have any questions, please contact me at (217) 785-6020.

Sincerely,

Andrew J. Jankowski
Project Manager
Federal Facilities Unit
Remedial Project Management Section
Bureau of Land

AJJ:CLS:ajj:SAFB.Site 7/Sludge Lagoon

enclosure

cc: Bureau File w/o enclosure

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ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

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(217) 785-6020
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February 27, 1996

Mr. Timothy Tedesco
375 AW/EM
701 Hanger Road
Scott Air Force Base, Illinois 62225-5035

Re: 1630105014 - St. Clair County
Scott Air Force Base (SAFB)
Closure Report for Site 7 Sludge Lagoon
Superfund/Technical Reports

Dear Mr. Tedesco:

The Illinois Environmental Protection Agency (IEPA) has reviewed the Installation Restoration Program (IRP) Closure Report for Site 7 Sludge Lagoon. This document was reviewed using the IEPA's Tiered Approach to Cleanup Objectives (TACO); Table C, Tier 1 Industrial/Commercial cleanup objectives.

Groundwater Contamination

The investigation identified many contaminants that exceeded groundwater cleanup objectives. According to the water well survey (figure 2-7) from the PA/SI for SAFB, the closest receptor via the groundwater pathway is approximately 2500 feet to the south. This distance coupled with the southeasterly flow of groundwater in the area appears to reduce the risk that contamination from the former sludge lagoon will pose to human health through consumption. It is also reasonable to assume that since the sludge lagoon's contents have been removed, the recharge of contaminants into the groundwater has been reduced. Other factors that were considered was the short length of time that the lagoon was in operation aa well as the time interval between close of operation and the removal of the lagoon. Another consideration was made of the 15 years that have passed since that closure and removal. Bearing these in mind, the IEPA will not require additional groundwater investigation nor require groundwater remediation to take place.

Soil Contamination

In reviewing the closure report's soil sample analysis, there exists a possibility of lingering contamination including, but not limited to, arsenic, benzene, ethyl benzene, lead, manganese,

vanadium and total xylene. These constituents are suspected to exist near the surface and may pose a threat to workers during taxiway construction. It is suspected that this residual contamination may in part, exist below the depth which the 1981 lagoon bottom excavation had removed, yet above the depth sampled in this investigation. This depth would represent the 0 to 4 feet below ground surface interval. The source of this contamination may include the lagoon's former berm and the soil which was under those berms. Since adequate records of the lagoon's removal do not exist, it is suspected that this soil may not have been removed and may still remain on site. Contamination from this interval would, depending on concentrations, threaten the health of the workers coming in contact with them. If construction takes place in the area of the former lagoon, contaminated soil may be disturbed and the construction workers would become receptors by ingestion and/or inhalation.

The IEPA proposes the following stipulations regarding Site 7:

1. If soil at Site 7 is to be disturbed during taxiway construction, then additional sampling will be required in the surface to four feet below ground surface interval. This sampling is being required to completely characterize the vertical extent of residual contamination at the site. The results of this sampling will be compared to the Table C Tier 1 - Industrial / Commercial Soil Cleanup Objectives for a Construction Worker via a ingestion and inhalation pathway. If the results of that sampling indicate that the site does not pose a threat to workers moving earth at the site, then closure will be granted for the site.

2. Closure will be granted for Site 7 if SAFB can show that earth moving related to taxiway construction will not disturb soil in the 0 to 4 feet below surface interval. By not disturbing the soil, the ingestion / inhalation pathway risk to the construction worker will be eliminated.

3. If contaminant levels exceed Tier 1 cleanup objectives, the IEPA would require SAFB to do one of the following:

    a.) Remediate the site to meet Tier 1 cleanup objectives

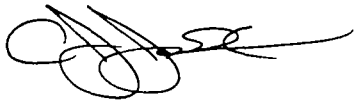
    b.) Develop Tier 2 or Tier 3 cleanup objectives for only those contaminants that exceed the Tier 1 values.

4. If item 2 applies, then SAFB would be required to place institutional controls on the former lagoon area. This would be to insure that the ground would not be disturbed for any construction or utility service related work.

The IEPA realizes that SAFB would like to proceed as quickly as possible with construction of the new taxiway. It is the desire of this Agency to expedite that construction. However, if there is the potential for risk to construction workers from this site, then steps will need to be taken to confirm and if need be, remediate that risk. This Agency will work directly with SAFB to quickly formulate and approve a sampling plan so that construction delays will be kept to a minimum.

If you would have any questions, please contact me at (217) 785-6020.

Sincerely,



Andrew J. Jankowski
Project Manager
Federal Facilities Unit
Remedial Project Management Section
Bureau of Land

AJJ:CLS:ajj:SAFB.Site 7

cc: Bureau File